

Application No.: 10/707,884

Docket No.: 22040-00028-US

**REMARKS**

Claims 4-6 and 12-14 are now pending in this application. Claims 4, 5, 12, and 13 are independent. Claims 4, 5, 12, and 13 have been amended, and claims 1-3, 7-11, and 15-18 have been canceled by this amendment. No new matter is involved with any claim amendment.

**Background Discussion**

By way of background, the present application, in various embodiments, is directed to a multistage amplifier and an integrated circuit. Applicant submits that it would not be obvious that substrates held by a plurality of amplifiers are each individually connected to the ground line. As discussed at least in paragraphs [0045] to [0047], Applicant's invention does not require arranging a pad exclusively for the substrate, and thus enables miniaturization of the area of the IC chip. In addition, a common substrate line is not required, and substrates of each amplifier are individually connected to the ground line, and are connected to the ground pad via the ground line. This approach is described as preventing coupling between the substrates of the various amplifiers, and thereby suppressing coupling noise from occurring.

The benefits described above are achieved by Applicant's invention by individually connecting substrates of each of the plurality of amplifiers to the ground line, not by simply connecting the substrates to ground. Applicant submits that a person of ordinary skill in the art would not and previously has not arrived at Applicant's solution. Applicant also asserts that any contention regarding this technique being known in the art is not founded or substantiated in any prior art, or in the knowledge of a person of ordinary skill.

**Anticipation Rejection over Sueyoshi**

Withdrawal of the rejection of claims 1, 3, 5, 6, and 8 under 35 U.S.C. §102(b) as being anticipated by Sueyoshi (Fig. 4) (US 4,237,426). Claims 1, 3, and 8 have been canceled, thus rendering their rejection moot.

Application No.: 10/707,884

Docket No.: 22040-00028-US

Applicant notes that anticipation requires the disclosure, in a prior art reference, of each and every limitation as set forth in the claims.<sup>1</sup> There must be no difference between the claimed invention and reference disclosure for an anticipation rejection under 35 U.S.C. §102.<sup>2</sup> To properly anticipate a claim, the reference must teach every element of the claim.<sup>3</sup> "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference".<sup>4</sup> "The identical invention must be shown in as complete detail as is contained in the ...claim."<sup>5</sup> In determining anticipation, no claim limitation may be ignored.<sup>6</sup> The applied art fails to disclose each limitation of the pending claims.

In particular, the applied art does not disclose a multistage amplifier which includes, among other features, "...a plurality of amplifiers...in a cascade connection...wherein substrates held by said plurality of amplifiers are each *individually* connected to [the] ground line," as recited in independent claim 5, as amended (emphasis added).

Further, dependent claim 6 depends from allowable claim 5, and is submitted as being allowable at least on that basis, without further recourse to the additional patentable features recited therein.

Accordingly, reconsideration and allowance of claims 5 and 6 are requested.

**Anticipation Rejection over Ishikawa et al.**

Withdrawal of the rejection of claims 1, 2, 5, and 8 under 35 U.S.C. §102(b) as being anticipated by Ishikawa et al. (US 5,982,236). Claims 1, 2, and 8 have been canceled, thus rendering their rejection moot.

<sup>1</sup> *Titanium Metals Corp. v. Banner*, 227 USPQ 773 (Fed. Cir. 1985).

<sup>2</sup> *Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 USPQ2d 1001 (Fed. Cir. 1991).

<sup>3</sup> See MPEP § 2131.

<sup>4</sup> *Verdegal Bros. v. Union Oil Co. of Calif.*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

<sup>5</sup> *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

<sup>6</sup> *Pac-Tex, Inc. v. Amerace Corp.*, 14 USPQ2d 187 (Fed. Cir. 1990).

Application No.: 10/707,884

Docket No.: 22040-00028-US

Specifically, the applied art does not disclose a multistage amplifier which includes, among other features, "...a plurality of amplifiers...in a cascade connection...wherein substrates held by said plurality of amplifiers are each *individually* connected to [the] ground line," as recited in independent claim 5, as amended (emphasis added).

Further, dependent claim 6 depends from allowable claim 5, and is submitted as being allowable at least on that basis, without further recourse to the additional patentable features recited therein.

Accordingly, reconsideration and allowance of claims 5 and 6 are requested.

#### Unpatentability Rejection over Sueyoshi

Withdrawal of the rejection of claims 4, 7, 9, and 11-18 under 35 U.S.C. §103(a) as being unpatentable over Sueyoshi (Fig. 4) is requested. Claims 7, 9, 11, and 15-18 have been canceled, thus rendering their rejection moot.

At the outset, Applicant notes that, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, *the prior art reference must teach or suggest all the claim limitations*.<sup>7</sup> Further, the teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure.<sup>8</sup> At least with respect to claims 4 and 12-14, the applied art does not meet the requirements for unpatentability set forth above.

Specifically, the applied art, either alone or in combination, does not teach or suggest a multistage amplifier which includes, among other features, "...a plurality of amplifiers that are constructed in a cascade connection manner...a ground line connected to said plurality of

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<sup>7</sup> See MPEP §2143.

Application No.: 10/707,884

Docket No.: 22040-00028-US

amplifiers; wherein substrates held by said plurality of amplifiers are each *individually* connected to said ground line," as recited in independent claim 4, as amended.

Further, the applied art, either alone or in combination, does not teach or suggest an integrated circuit which includes, among other features, "...a plurality of amplifiers that are constructed in a cascade connection manner...a ground line connected to said plurality of amplifiers...wherein substrates held by said plurality of amplifiers are each *individually* connected to said ground line," as recited in independent claim 12, as amended.

Finally, the applied art, either alone or in combination, does not teach or suggest an integrated circuit which includes, among other features, "...a plurality of amplifiers that are constructed in a cascade connection manner...a ground line connected to said plurality of amplifiers...wherein substrates held by said plurality of amplifiers are each *individually* connected to said ground line," as recited in independent claim 13, as amended.

Further, dependent claim 14 depends from allowable claim 13, and is submitted as being allowable at least on that basis, without further recourse to the additional patentable features recited therein.

Accordingly, reconsideration and allowance of claims 4 and 12-14 are requested.

**Unpatentability Rejection over Ishikawa et al.**

Withdrawal of the rejection of claims 4, 7, 9, 10, 12, 13, and 15-18 under 35 U.S.C. §103(a) as being unpatentable over Ishikawa et al. (Fig. 1) is requested. Claims 7, 9, 10, and 15-18 have been canceled, thus rendering their rejection moot.

Specifically, the applied art, either alone or in combination, does not teach or suggest a multistage amplifier which includes, among other features, "...a plurality of amplifiers that are constructed in a cascade connection manner...a ground line connected to said plurality of

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<sup>8</sup> *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) and *See* MPEP §2143.

Application No.: 10/707,884

Docket No.: 22040-00028-US

amplifiers; wherein substrates held by said plurality of amplifiers are each *individually* connected to said ground line," as recited in independent claim 4, as amended.

Further, the applied art, either alone or in combination, does not teach or suggest an integrated circuit which includes, among other features, "...a plurality of amplifiers that are constructed in a cascade connection manner...a ground line connected to said plurality of amplifiers...wherein substrates held by said plurality of amplifiers are each *individually* connected to said ground line," as recited in independent claim 12, as amended.

Finally, the applied art, either alone or in combination, does not teach or suggest an integrated circuit which includes, among other features, "...a plurality of amplifiers that are constructed in a cascade connection manner...a ground line connected to said plurality of amplifiers...wherein substrates held by said plurality of amplifiers are each *individually* connected to said ground line," as recited in independent claim 13, as amended.

Further, dependent claim 14 depends from allowable claim 13, and is submitted as being allowable at least on that basis, without further recourse to the additional patentable features recited therein.

Accordingly, reconsideration and allowance of claims 4 and 12-14 are requested.

#### Conclusion

In view of the above amendment, applicant believes pending claims 4-6 and 12-14 in this application is in condition for allowance.

In the event the Examiner believes that an interview would be helpful in resolving any outstanding issues in this case, the undersigned attorney is available at the telephone number indicated below.

Application No.: 10/707,884

Docket No.: 22040-00028-US

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 22-0185, under Order No. 22040-00028-US from which the undersigned is authorized to draw.

Respectfully submitted,

By

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